

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

GEORGE ANTHONY DEVOLDER  
SANTOS,

Also known as “George Santos”

*Defendant.*

23-cr-197 (S-1) (JS) (AYS)

**DECLARATION OF ANDREW  
MANCILLA IN SUPPORT OF  
DEFENDANT GEORGE ANTHONY  
DEVOLDER SANTOS’ PRETRIAL  
OMNIBUS MOTIONS**

I, ANDREW MANCILLA, an attorney duly admitted to practice before this Court, hereby declares under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. I am an attorney of record for the Defendant George Anthony Devolder Santos (“Santos”), and as such I am fully familiar with the facts and circumstances stated herein.
2. I submit this declaration in support of Defendant Santos’ Pretrial Omnibus Motions.
3. Annexed hereto as **Exhibit “A”** is a true and accurate copy of the transcript of the oral argument on February 27, 2023, in *Dubin v. United States*, 143 S. Ct. 1557 (2023).
4. Annexed hereto as **Exhibit “B”** is a true and accurate copy of the government’s disclosure letter dated October 27, 2023.
5. Annexed hereto as **Exhibit “C”** is a true and accurate copy of the government’s disclosure letter dated March 14, 2024.
6. Annexed hereto as **Exhibit “D”** is a true and accurate copy of defendant’s letter dated April 8, 2024, requesting discovery and a bill of particulars.

7. Annexed hereto as **Exhibit “E”** is a true and accurate copy of the government’s letter dated April 9, 2024, denying and responding to the defendant’s requests in his letter dated April 8, 2024.

Dated: May 3, 2024  
New York, New York

/s/ Andrew Mancilla  
ANDREW MANCILLA, ESQ.

To: All parties of record via ECF